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Plaintiff in Pro Per

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,  
  
Plaintiff,  
  
vs.  
  
RIOT GAMES, INC.,  
  
Defendant

CASE NO. 2:25-CV-00053-FMO-BFM  
  
HON. FERNANDO M. OLGUIN  
  
PLAINTIFF'S MOTION IN LIMINE TO  
ADMIT EVIDENCE  
  
DATE: FEBRUARY 27, 2025  
TIME: 10:00 A.M.  
CRTRM: 6D

JANUARY 29, 2025

Dated this: JANUARY 29, 2025

M. WOLSTENHOLME.  
[MARC WOLSTENHOLME]

COMPARISON OF CHARACTERS FROM ARCANE & BLOODBORG- SILCO AND  
COWBOY MOMAHAN

**I. Introduction:**

I, Marc Wolstenholme, am the plaintiff in this matter, representing myself pro se. This declaration is made in support of my PLAINTIFF’S MOTION IN LIMINE TO ADMIT EVIDENCE, to submit additional evidence relevant to my claims against Riot Games, Inc. for copyright infringement, unfair competition, and intentional infliction of emotional distress.

**II. Evidence Submitted:**

I submit the following evidence of COMPARISON OF CHARACTERS FROM ARCANES & BLOODBORG- SILCO AND COWBOY MOMAHAN. This is not an exhaustive list, but serves to demonstrate key elements of my original work and the substantial similarities between my work and the infringing material produced by Riot Games, Inc.

**III. Comparison of Characters:**

This document specifically shows the striking similarities between SILCO, one of the main antagonists of Arcane season 1, compared to COWBOY MOMAHAN, the main antagonist of Rook’s POV in Bloodborn.

**Comparative Analysis: Silco (Arcane) vs Cowboy Momahan (Bloodborg) with The High  
Commander as a Secondary Mirror**

**Introduction:** Villainous Archetypes with Complex Motivations

Silco (Arcane) and Cowboy Momahan (Bloodborg) are central figures in their respective narratives, embodying morally grey villains driven by personal traumas, unyielding ambition, and a deep sense of betrayal. Both characters challenge the archetype of a traditional antagonist by displaying complex emotional layers, sympathetic backstories, and moments of vulnerability. These elements make them far more compelling, and far more alike than the simplistic villains often seen in film, TV, animation and stories.

The High Commander (Bloodborg), as a secondary mirror to Cowboy Momahan, offers a different perspective on the moral corruption that comes with prolonged life, prolonged blood drug use, and exposure to violence. While both Silco and Cowboy Momahan seek control over their domains through manipulative and ruthless tactics, The High Commander illustrates a parallel trajectory of a fallen leader, similarly consumed by ambition, trauma, long life, and addiction to blood-based drugs.

1                   **1. Origins and Backstory: From Honor to Fall**

2                   **Silco (Arcane):** Silco begins as a revolutionary with a dream of Zaun's  
3 independence. Once an ally of Vander, he experiences a defining betrayal when Vander nearly  
4 drowns him in a polluted river during a conflict. This traumatic event scars both his face and his  
5 psyche, catalyzing his descent into the blood drug fueled ruthless underworld figure we see in  
6 Arcane. His reliance on Shimmer to manage his physical and emotional scars mirrors his inner  
7 struggle, highlighting a man deeply shaped by pain and betrayal.  
8

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10                   **Cowboy Momahan (Bloodborg):** Cowboy Momahan shares a strikingly similar  
11 narrative. He was once a decorated commander in the Assemblage Defence, fighting for his  
12 people's cause. However, his fall from grace stems from his involvement in the smuggling, use,  
13 and sale of rare blood drugs, an addiction that began as a coping mechanism for his PTSD.  
14 Banished to New Kowloon, Cowboy becomes a gang leader of the Feral Fighters, using his  
15 underworld influence to amass power and pursue his twisted ambition of becoming the "King of  
16 New Kowloon." His once-honorable identity is now replaced by a volatile, narcissistic, and  
17 manipulative persona.  
18  
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21                   **The High Commander (Bloodborg):** The High Commander serves as a  
22 secondary mirror, reinforcing Cowboy Momahan's themes of corruption and trauma. As a war  
23 veteran who has lived far beyond normal life expectancy, he is trapped in a cycle of addiction to  
24 Fetal Sapient Serum. His obsession with combat and his descent into delusion reflect the long-  
25 term effects of PTSD and prolonged exposure to war, similar to Cowboy's psychological  
26  
27

deterioration. Both characters share a connection to military leadership, a fall into addiction, and a hunger for control over chaotic environments. Silco, while not formally a military veteran, shares all of these traits.

## **2. Leadership Styles and Ideologies**

**Silco (Arcane):** Silco is a manipulative and charismatic leader who rules Zaun's criminal underworld with an iron fist. His vision for Zaun's independence is rooted in genuine resentment of Piltover's exploitation, but his methods are brutal and often hypocritical. Silco leverages Shimmer not only as a weapon but as a tool of control, ensuring loyalty from his followers by exploiting their addictions. Despite his ruthlessness, his paternal bond with Jinx showcases his capacity for genuine care, adding depth to his character.

**Cowboy Momahan (Bloodborg):** Cowboy Momahan's leadership style mirrors Silco's, as he also uses addiction and manipulation to maintain control over his Feral Fighters. Like Silco, Cowboy positions himself as a savior of the underworld, though his motivations are self-serving. Cowboy's reliance on neurotransmitter drugs to stabilize his mental state mirrors Silco's dependency on Shimmer. Both leaders are deeply flawed, but their charisma and vision inspire loyalty among their subordinates.

**The High Commander (Bloodborg):** The High Commander's leadership contrasts with Silco and Cowboy in that it is more militaristic and less grounded in manipulation. However, his addiction to Fetal Sapient Serum and his erratic behavior undermine his authority,

1 highlighting the fragility of his control. Like Cowboy and Silco, his delusions of grandeur are  
2 rooted in a deep-seated need to maintain relevance and power in a chaotic world.

### 3 4 5 **3. Moral Ambiguity and Psychological Depth**

6 **Silco (Arcane):** Silco is the embodiment of moral ambiguity, seamlessly  
7 transitioning between moments of tender vulnerability and cold-hearted ruthlessness. His  
8 relationship with Jinx humanizes him, showing his capacity for love and care, even as he  
9 manipulates others for personal gain. Silco's trauma and subsequent transformation into a villain  
10 highlight how external circumstances can corrupt even the most idealistic individuals.  
11

12  
13 **Cowboy Momahan (Bloodborg):** Cowboy Momahan is similarly morally  
14 ambiguous, blending moments of cruelty with traces of his former self. His backstory reveals a  
15 man who was once noble but was gradually eroded by trauma and addiction. Cowboy's mental  
16 instability, fueled by blood-based drugs and years of suffering, adds a layer of unpredictability to  
17 his character, making him both terrifying and pitiable.  
18

19  
20 **The High Commander (Bloodborg):** The High Commander's moral ambiguity  
21 stems from his role as a protector of the wall, juxtaposed with his personal flaws and erratic  
22 behavior. His addiction to blood-based drugs and his descent into madness reflect the  
23 psychological toll of war, mirroring the struggles of Cowboy and Silco. However, his actions are  
24 often driven by a sense of duty, blurring the line between heroism and villainy.  
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1                   **4. Addiction to Blood-Based Drugs**

2                   Both Silco and Cowboy Momahan rely on blood-based substances to maintain  
3 their physical and mental stability, further emphasizing their fragility beneath their imposing  
4 exteriors.  
5

6                   **Silco (Arcane):** Silco uses Shimmer to manage the long-term effects of the toxins  
7 from the polluted river that scarred his face. The drug enhances his physical endurance but  
8 exacerbates his paranoia and volatility. His dependency on Shimmer mirrors his dependency on  
9 power, as both serve as crutches for his insecurities and trauma.  
10

11                   **Cowboy Momahan (Bloodborg):** Cowboy's digital cigar administers  
12 neurotransmitters to stabilize his emotions and counteract the effects of long-term blood-drug  
13 use. His addiction symbolizes his inability to confront his inner demons, paralleling Silco's  
14 reliance on Shimmer. Both characters are trapped in cycles of self-destruction, using these  
15 substances to mask their vulnerabilities.  
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18                   **The High Commander (Bloodborg):** The High Commander's addiction to Fetal  
19 Sapient Serum reflects the theme of dependency seen in Silco and Cowboy. However, his reliance  
20 on the drug is framed as both a physical necessity and a means of coping with his deteriorating  
21 mental state, adding another layer to the narrative of addiction and its consequences.  
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1                   **5. Symbolism and Legacy**

2                   **Silco (Arcane):** Silco's legacy lies in his vision for Zaun's independence and his  
3 influence on Jinx. His tragic downfall highlights the cost of ambition and the complexities of  
4 leadership in a morally grey world.  
5

6  
7                   **Cowboy Momahan (Bloodborg):** Cowboy's legacy is one of chaos and  
8 destruction, as he seeks to unite the gangs of New Kowloon under his rule. His volatile nature  
9 and addiction ultimately undermine his ambitions, serving as a cautionary tale of how power and  
10 trauma can corrupt.  
11

12  
13                   **The High Commander (Bloodborg):** The High Commander's legacy is defined  
14 by his unwavering commitment to "The Stand," even as his mental and physical state deteriorate.  
15 His character serves as a reminder of the toll that prolonged exposure to violence and addiction  
16 can take on even the most resilient individuals.  
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**Conclusion: A Trifecta of Corruption and Complexity**

Silco, Cowboy Momahan, and The High Commander represent three facets of the morally grey antagonist archetype. All three characters are shaped by trauma, addiction, and a desire for control, making them both compelling and deeply flawed. Their shared traits highlight the broader themes of power, corruption, and the human (or inhuman) cost of ambition in their respective narratives. Silco's polished and poised villainy contrasts with Cowboy's erratic brutality, while The High Commander offers a militaristic perspective on the same descent into madness. Together, these characters serve as intricate reflections of one another, embodying the complex dynamics of leadership, addiction, and moral ambiguity. Cowboy and The High Commander were written to reflect and contrast each other. Silco fits right into the mix, seemingly being a reworked, subtle and more poised, dialed down version of Cowboy Momahan.

As presented, the similarities in these characters go far deeper and darker than anything which could have happened by chance. These are not tropes or archetypes. Indeed, Silco has been praised for not being a trope or cardboard villain. The plaintiff will provide exhibits to demonstrate that Silco, his design and his story, are extremely similar to Cowboy Momahan, the Bloodborg narratives and the Plaintiff's personal trauma.

**Exhibits.**

**Exhibit A- Meet Silco/ Meet Cowboy Momahan.**



1 **A1. From Rook's POV, text that describes Cowboy Momahan's appearance**  
2 **and mannerisms.**

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4  
5 Cowboy's Voice and Commanding Presence- Cowboy's voice was designed as an  
6 integral part of who he is. This is the same with Silco, who is voiced by Jason Spisak. Silco is  
7 known for his voice and monologues.

8  
9 *BB- "Cowboy Momahan sniffed in intensely, dragging mucus and whatever other*  
10 *substances through his nostrils and into the roof of his mouth. He coughed into his radio*  
11 *microphone sending a loud screech through the speakers."*  
12

13  
14 Cowboy's Dialect and Style- Cowboy has a new world broken speak, deep south  
15 dialect, which becomes a big part of who he is. Silco's voice also plays a pivotal role in his  
16 character design.  
17

18  
19 *BB- "Y'all bring that monkey climbing piggy fuck to me, is what you gonna do.*  
20 *Aah wanna know who this yellah belly dog fucker working for, and why he ain't working for me.*  
21 *Aah'm the diddy of this here District. This sinking city gonna be mahn someday."*  
22

23  
24 *"Y'all coming with me, if y'all lac. Just so long as you catch me that dawg, be-fo-*  
25 *wal it's too late, be-fo-wal that Lickety split boy cause us here some more damage. Aah'm taard*  
26 *of that boy running rings around mah boys and make-in us 'all look lac fools."*  
27

1  
2 Cowboy's Violent Personality- Both Cowboy and Silco share this violent,  
3 unhinged, drug filled temper.  
4

5  
6 *BB- "Aah think it's elephanfantastic, don't you little girly,' said Cowboy, taking*  
7 *tobacco out of his mouth and pressing it into Rook's eyes. Rook rattled her chains, wincing her*  
8 *eyes, trying to wipe them clean with her shoulder."*  
9

10  
11 Cowboy's Physical Appearance and Demeanor- Both Cowboy Momahan and  
12 Silco wear cowboy like attire and boots.  
13

14 *BB- "Cowboy Momahan danced around naked, less the white Cowboy boots with*  
15 *metal heel spikes and his matching cowboy hat. Rook choked up the ball of tobacco leaves*  
16 *blocking her windpipe. She spat back into Cowboy Momahan's face."*  
17  
18

19 Cowboy's Sadistic Cruelty- Both Silco and Cowboy can be sadistically cruel at  
20 times, yet this is dialed down in Silco.  
21

22 *BB- "Rook reopened her eyes, unsure if the body was real. Dodge's nose had*  
23 *been cut off..."*  
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1 Cowboy's Narcissism- Both Cowboy and Silco share narcissistic tendencies, to  
2 differing degrees.

3 BB- *“Now y’all look at that virgin ass, mah gonna make you moan, you gonna*  
4 *call me diddy,’ he said, stepping out of his white Cowboy boots.”*  
5

6  
7 These quotes paint Cowboy Momahan as a violent, cruel, and grotesque figure,  
8 blending sadistic behavior with a warped sense of humor. His unique dialect and choice of attire,  
9 specifically his white cowboy boots and matching hat, cement his image as a deranged and  
10 domineering antagonist in Bloodborg. Cowboy is more “Far Gone” on the self-damage scale  
11 than Silco. However, it is alleged that they are one and the same, matched and dialed down to  
12 mask IP infringement.  
13

**Exhibit B- King of the Underworld.**

Silco is trying to cause war against topside (Piltover) and trying to gain power over the people of the undercity (Zaun). He has vowed to unite the gangs and Chem-Barons to incite war and to become the king of the nation of Zaun. This is alleged to be the same storyline and motivation as Cowboy Momahan in Bloodborg.

**In Bloodborg-**

*“Cowboy Momahan is attempting to take control of all of The Needle district. He is trying to recruit an army to plunder the city.”*

Later

*“Cowboy Momahan, the leader of the Feral Fighters, has vowed to unite the gangs, the hunters and raiders of The Needles district, to fight against other districts, for full control of New Kowloon. He has announced that he will be the first King of New Kowloon.”*

Later

*“There low morals and excessive use of chemical highs meant that Cowboy Momahan could effortlessly control them.”*

Later

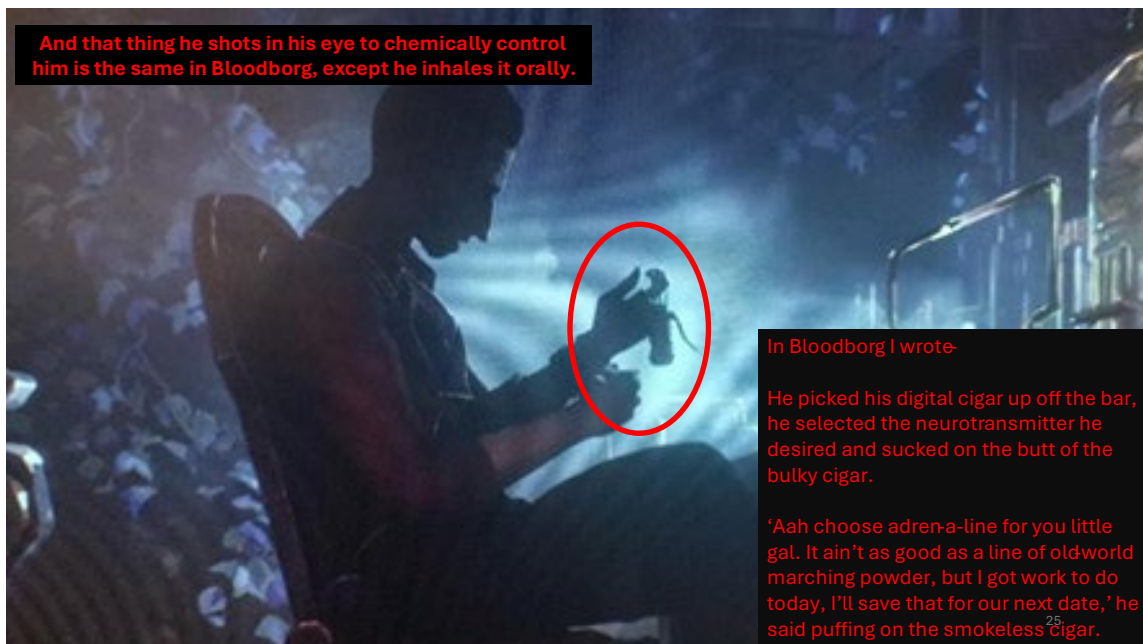
*“‘Are the Assemblage planning to invade New Kowloon.’*

*‘Yes, yes, but not if Cowboy Momahan gets them all they desire, they will spare the city, give it to him even, make him the First King of New Kowloon.’”*

**Exhibit C- Blood-Drug- Chemically Regulated.**

In Bloodborg, Cowboy Momahan has abused Blood-based drugs mixed with direct neurotransmitter chemicals for so long that his brain can no longer regulate emotions without injecting chemicals and blood-drugs. This is a play on the Plaintiff's history of illicit drug use and prescription drug use, and anti-depressants, post war and during a turbulent transition into civilian life.

Cowboy is barely kept in check with inhaled neurotransmitter blood-based drugs with the inhales through a digital cigar. Silco self regulates in the same way, yet he injects the blood-based drug into his eyeball. In Bloodborg, the most common method of taking these blood-drugs is injection, most commonly in the neck. For some, drones or inbuilt technology administers the drugs.



**Exhibit D – Blood Based Drugs (Shimmer and Fetal Sapien Serum).**

**In Arcane-** Silco is harvesting and stockpiling a Blood-drug called Shimmer.

**In Bloodborg-** Cowboy Momahan is harvesting and stockpiling a Blood-drug,  
mostly called Fetal Sapien Serum.

**The difference-** One is purple, the other is red... and the name is different.





**Exhibit E – Silco and others Falling and Drowning.**

The drowning & falling scenes are a cyclical narrative beat, which we see in Both Bloodborg and astoundingly similar in Arcane. The Plaintiff alleges that this is directly referencing his trauma and trauma nightmares and sleep paralysis, as all of his work is trauma writing as a control mechanism and cathartic release.

**In Arcane** Silco and others experience this cyclical trauma and dreamlike theme of falling or drowning. Silco has a flashback to Vander attempting to drown him in the water.

**Throughout the Arcane series**, we see the mirrored repetition of drowning and falling, or the aesthetics of it, in Powder, Jinx, Silco, Vander, Shimmer Vander, Isha and Bloodborg Warwick.

**In Bloodborg**, we see the mirrored repetition of drowning and falling, or the aesthetics of it, in Josh, D’borg, Rook, Jade and A young gangway child.

**E1. Silco's Drowning Monologue**

Silco's drowning monologue has become his most infamous and recognized words from the Arcane series.

***Monologue***

"Ever wonder what it's like to drown? Story of opposites. There's peace in water. Like it's holding you, whispering in low tones to let it in. And every problem in the world will fade away. But then, there's this thing... in your head, and it's raging. Lighting every nerve with madness. To fight. To survive. And all the while this question lingers before you: "Have you had enough?" It's funny. You could pass a lifetime without ever facing a choice like that. But it changes you forever."

**To break it down,**

**In Arcane,** In Silco's drowning monologue, Silco says, "...*it's holding you, whispering in low tones to let it in...*"

**In Bloodborg,** in one of the POV's, Josh says "*The grey smoky clouds closed in around me, devouring me, stealing my breath like a windy assassin. I crashed into the black water.*"

The above extracts are both from drowning scenes in black water, with the characters sinking on their backs, which is alleged to be directly referencing the Plaintiff's trauma and sleep paralysis.

1 It is alleged that, from Silco’s Monologue, “whispering in low tones” and from  
2 Josh’s POV, “devouring me, stealing my breath like a windy assassin”, are essentially different  
3 word for the same expression, reworked for the same meaning. This highlights a potential  
4 linguistic and conceptual parallel between Silco’s Monologue in Arcane and Josh’s POV in  
5 Bloodborg. Both phrases, while stylistically distinct, communicate the same underlying idea: a  
6 powerful, stealthy, and dominating presence exerting control or influence over someone else.  
7 The differences in word choice reflect the stylistic preferences of their respective “Writers”, but  
8 the thematic and emotional resonance remains consistent. Silco’s Monologue is concise and  
9 restrained, fitting his calculated and menacing personality. Josh’s POV is more descriptive and  
10 poetic, reflecting a vivid and sensory-driven style typical of inner monologues.  
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13 The alleged reworking involves transforming the concept of quiet, overpowering  
14 influence from Silco’s controlled delivery into a more visceral, metaphorical description in  
15 Bloodborg. This demonstrates how similar ideas can be adapted and reframed to fit different  
16 characters and narrative tones while maintaining the same core meaning. With tugged at the  
17 heart of the central alleges of copyright infringement in these cases, which hold that,  
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19 Just enough masking has been applied to attempt to hide the theft and build  
20 plausible deniability.  
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**E2- Lay on my back.**

Because of the Plaintiff's past brain injury and PTSD, he cannot fall asleep lying on his back. If he does, he experiences sleep paralysis, the feeling of dying, falling or drowning in blackness. This was written into Bloodborg, which is all trauma writing.

**In Bloodborg,** Josh says, *"I feel as though I'm submerged in icy black water as I lay on my back."*

**Arcane-** We visually see this represented over and over in Arcane's cyclical and relentless narrative theme of the same.



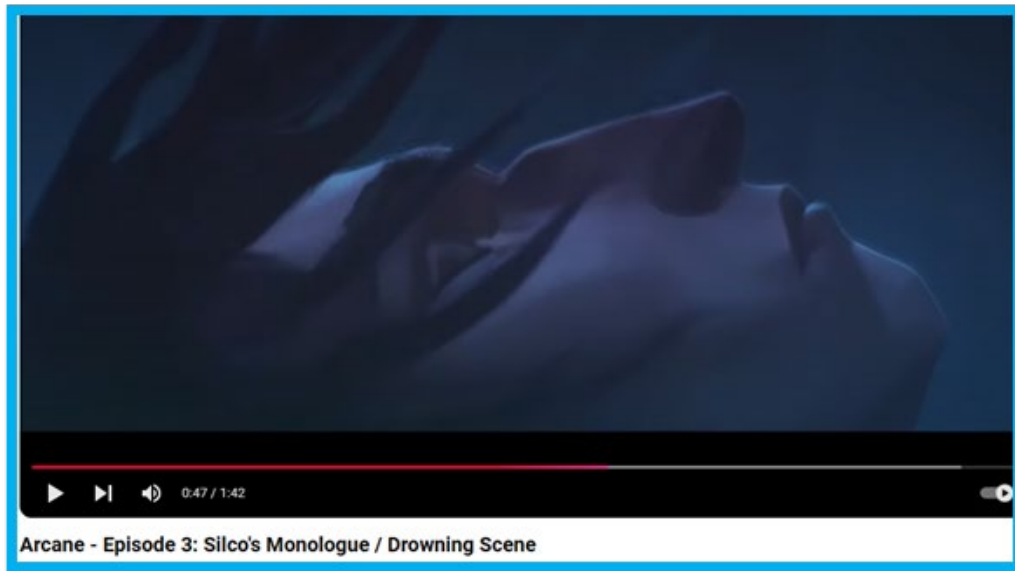
**E3- Fighting against the death.**

During sleep paralysis and trauma nightmares, the Plaintiff sometimes dies in his sleep. This is directly linked to dying in real life and being placed in a body bag by German police officers, then being taken out and revived several times and being brought back to life over and over by a paramedic. This, and other traumatic events, including nearly drowning in a kayak in the British Army, were fed into the writing of events and themes in Bloodborg.

**In Bloodborg-** *“Jade’s nose gave off a line of bubbles. The bubble’s struggled towards the surface, slowing as the gel coagulated. As the first bubble broke the surface, Ling laboriously retracted her hand from the gel. The gel set like jelly, locking Jade under what felt like a ton of sinking sand.*

*Jade had counted to thirty, Ling had not returned. Jade panicked trying to fight her way out, which only locked her tighter. Her eyeballs darted around in her head frantically, reddening as she clung to life.”*

**Arcane-** We visually see this represented in Silco's drowning scene.



1                   **F. Conclusion: Striking Similarities and Substantive Parallels**

2                   The evidence presented herein establishes compelling and substantive parallels  
3 between Bloodborg: The Harvest and Arcane, particularly in the characterization, motivations,  
4 and narrative arcs of Cowboy Momahan, The High Commander, and Silco. The comparisons  
5 highlight not only overlapping thematic structures but also detailed similarities in their  
6 backstories, behaviors, visual presentations, and emotional complexities. These parallels extend  
7 far beyond mere coincidence, archetypal storytelling, or thematic tropes. Rather, they suggest  
8 deliberate reworking and reframing of existing, original material from Bloodborg to fit the  
9 framework and visual style of Arcane.  
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13                   **F1. Uncanny Overlap in Characterization**

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15                   Both Silco and Cowboy Momahan embody morally ambiguous leaders consumed  
16 by ambition, trauma, and addiction. Their paths from once-noble figures to ruthless villains are  
17 marked by betrayals, substance dependencies, and complex relationships with subordinates and  
18 close allies. The High Commander further serves as a secondary mirror, reinforcing the themes  
19 of psychological deterioration, prolonged exposure to violence, and addiction. The distinct use of  
20 blood-based drugs as both a literal and symbolic mechanism to explore fragility and dependence  
21 serves as a central narrative tool in both works, underpinning these characters' complexities.  
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1 **F2. Trauma and Drowning as a Narrative Thread**

2 The cyclical use of drowning imagery in both works reflects not only a central  
3 motif of falling and loss but also resonates deeply with the Plaintiff's personal experiences of  
4 trauma and sleep paralysis. This theme is reiterated across both works in startlingly similar visual  
5 and narrative terms. The repeated representation of falling, lying on one's back, and struggling  
6 against suffocation captures the haunting, visceral sensations of death and survival, themes  
7 derived directly from the Plaintiff's life and embedded in Bloodborg. Silco's drowning  
8 monologue and Josh's internal reflections serve as distinct yet strikingly similar narrative  
9 embodiments of this motif.  
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13 **F3. Visual and Emotional Parallels**

14 The distinctive voice and demeanor of Cowboy Momahan, with his Southern  
15 dialect, erratic cruelty, and sadistic tendencies, finds a close parallel in Silco's commanding,  
16 manipulative presence and his iconic, softly menacing monologues. Furthermore, the physical  
17 appearances, mannerisms, and styles of both characters—right down to their scars, accessories  
18 (injector, lighter), and leadership personas—underscore an undeniable mirroring. These  
19 similarities are further supported by their respective roles as underworld leaders seeking to  
20 consolidate power and control over fractured societies.  
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1 **F4. Blood-Based Drugs and Addiction**

2 Both Silco and Cowboy Momahan rely on blood-based drugs (Shimmer in Arcane  
3 and Fetal Sapien Serum in Bloodborg) to sustain themselves, stabilize their deteriorating  
4 conditions, and exert control over those around them. The High Commander's prolonged use of  
5 Fetal Sapien Serum parallels Silco's Shimmer injections, reinforcing the thematic consistency of  
6 addiction, moral corruption, and physical dependency. While Shimmer is presented with a purple  
7 hue for cultural sensitivity in Arcane, its functional and narrative role is practically identical to  
8 that of Fetal Sapien Serum.  
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11 **F5. A Pattern of Reworking and Masking**

12 The linguistic and thematic parallels, such as Silco's drowning monologue and  
13 Josh's vivid description of sinking into blackness, reveal a pattern of reworking concepts from  
14 Bloodborg into Arcane. This extends to aesthetic choices, recurring motifs, and character arcs.  
15 The evidence suggests an intentional masking of the source material, altering enough superficial  
16 elements—names, colours, or minor details—to create plausible deniability while retaining the  
17 essence and impact of the original work.  
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1                   **F6. A Personal Reflection of Trauma**

2                   The Plaintiff's life experiences, including near-death events, sleep paralysis, and  
3 struggles with trauma, are deeply woven into the fabric of Bloodborg. These personal elements,  
4 echoed in Arcane through its themes of drowning, trauma, and moral ambiguity, raise significant  
5 concerns regarding the appropriation of deeply personal material, and the lack of countability for  
6 the emotional harm caused, thereafter.  
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9                   **F7. Final Statement**

10                  The cumulative weight of these comparisons establishes a clear, consistent pattern  
11 of substantial similarity between Bloodborg and Arcane. The extensive parallels in  
12 characterization, thematic motifs, visual and narrative devices, and the central use of blood-based  
13 drugs and trauma narratives cannot be dismissed as coincidental. These overlaps point to the  
14 likelihood of deliberate and systematic appropriation of the Plaintiff's original work. The  
15 Plaintiff respectfully requests that this evidence be admitted and that due consideration be given  
16 to the depth and breadth of these similarities in evaluating the claims of copyright infringement,  
17 unfair competition, and intentional infliction of emotional distress.  
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1 The Plaintiff, Marc Wolstenholme, M.W.

2 Wolf. Date: JANUARY 29, 2025

3 Signed: *M. WOLSTENHOLME.*  
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